

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-00345

**STIPULATION AND JOINT
PROPOSAL FOR BRIEFING
SCHEDULE**

STIPULATION

The Parties hereby agree, stipulate, and propose to the Court for approval the following schedule:

1. Plaintiffs shall file a second amended complaint on or before September 23, 2025;
2. Defendants may defer responding to the second amended complaint until after the Court's ruling on the summary judgment motion(s), to the extent a response is necessary;
3. Defendants shall file the administrative record for this case on or before October 24, 2025;
4. The Parties agree to dispense with Local Rule 56(a)(1)'s requirement that a motion for summary judgment "be accompanied by a separate Statement of Undisputed Facts";
5. Plaintiffs shall file any motion for summary judgment on or before November 14, 2025;
6. Defendants shall file any response to Plaintiffs' motion for summary judgment, as well as any cross-motion for summary judgment, on or before December 5, 2025;
7. Plaintiffs shall file any reply to Defendants' response to Plaintiffs' motion for summary judgment, as well as any response to cross-motion for summary judgment, on or before December 19, 2025; and
8. Defendants shall file any reply to Plaintiff's response to cross-motion for summary judgment on or before January 9, 2025.

Dated: September 17, 2025

Respectfully submitted,

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